



NEW YORK CITY COMPTROLLER
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Protecting our Neighbors

A Call to Rapidly Expand Immigration Legal Services in the Face of Federal Overreach

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Executive Summary

The federal immigration enforcement landscape is rapidly shifting with unprecedented enforcement tactics and mass cancellations of lawful status. These changes are particularly felt in New York City, whose population is nearly 40% foreign born and where half of all New York City residents live with an immigrant.¹ Access to legal representation can help noncitizen New Yorkers remain in their communities, workplaces, and homes. As changes to federal

immigration policy put more and more New Yorkers at risk of enforcement, detention, and deportation, the need for legal services has grown tremendously.

This policy brief outlines recent changes to federal immigration policy, City spending and programming related to immigration legal services and other supports, and outlines budget, policy, and programmatic recommendations to bolster and maintain immigration legal services for New Yorkers. This brief recommends New York City and state should:

- Dramatically increase the City’s investments in immigration legal services, including:
 - \$60 million for immigration legal services, including for the restoration of ActionNYC in schools, libraries, and hospitals.
 - \$40 million for the Immigration Opportunity Initiative (IOI) which provides legal services to low-income immigrants for citizenship, permanent residence, and other immigration-related legal services.
 - \$34 million for the New York Immigrant Family Unity Project (NYIFUP), the City’s first and largest public defender program in the country for detained immigrants in removal proceedings before an immigration judge.
- Restore critical legal services programs that have been cut or eliminated including:
 - ICARE’s programs to provide legal representation to unaccompanied children in removal proceedings with an additional \$11 million, which have been subject to federal funding cuts.
 - The Rapid Response Legal Collaborative (RRLC) which provides legal assistance to those detained with an additional \$25 million, or at imminent risk of detention and deportation.
- Expand I-ARC’s Friend of the Court Program to protect immigrants against abuse of power when individuals appear unrepresented in immigration court.
- Repurpose the Asylum Application Help Center Infrastructure to continue connecting asylum seekers in City shelters with connections to legal services.
- Mobilize City agencies and frontline workers to protect immigrants from federal immigration enforcement by training workers, funding know your rights education, and licensing street vendors.
- Strengthen the City’s Sanctuary Laws including passing the New York City Trust Act (Intro 214-2024, sponsored by Council Member Shahana Hanif) which would create a private right of action for individuals unlawfully detained or targeted through City cooperation with federal immigration authorities—and hold agencies financially accountable for damages through their own budgets.

- Pass the Access to Representation Act (S141/A270 sponsored by Senator Hoylman-Sigal and Assembly Member Cruz), which would guarantee legal representation to New Yorkers facing deportation who cannot afford an attorney of their own.

Introduction

Funding for immigration legal services has never been more urgent. While New York City continues to be a national leader in funding immigration legal services, there is still much more the City can do to meet the growing need for legal help in this time of unprecedented attacks on immigrant communities.

Immigrants, irrespective of status, benefit New York City's economy as workers, entrepreneurs, and taxpayers.² Detention and deportation tear families apart, destabilize communities, and undermine economic growth. Immigration legal services can help noncitizen New Yorkers stabilize their immigration status and find pathways to citizenship. Pathways to work authorization and naturalization allow for greater earning potential, which in turn results in greater tax revenue and other economic benefits to New York City.³ Access to representation in removal proceedings greatly improves the chances of immigrants winning their case.⁴

The Trump Administration has been pursuing its "mass deportation" agenda by invoking arcane provisions of law that has broadened the scope of noncitizens who may be targeted for immigration enforcement. New Yorkers have been arrested and detained by Immigration and Customs Enforcement (ICE) without due process of law, including those with lawful status. Rapid shifts in federal immigration policy make cases more complex, accentuating the need for legal help.

At the same time, the Adams Administration's programs and budget proposals do not account for the growing need and shifting landscape, which could leave many New Yorkers vulnerable to detention and deportation.

Understanding the Urgency

The Trump Administration has terminated the lawful status of hundreds of thousands of immigrants across the country, including tens of thousands of New Yorkers. For example, the cancellation of the Cuban Haitian Nicaraguan Venezuelan (CHNV) Humanitarian Parole program alone stripped over 500,000 people of status.⁵ The cancellation of Temporary Protected Status (TPS) for Venezuela leaves over 350,000 people without status.⁶ These abrupt terminations of lawful status have left people undocumented and without protection overnight. Among those left in legal limbo includes many new arrivals to New York City that the City has spent considerable money and time assisting in applying for those very forms of protection.

The Alien Enemies Act has for the first time been used outside of a wartime context, with the federal government labelling certain transnational gangs as terrorist organizations.⁷ This has been used to circumvent due process protections for noncitizens, and the Trump Administration has sent immigrants to prisons in third countries without ever seeing a judge.⁸ And the Secretary

of State has relied on Section 212(a)(3)(C) of the Immigration and Nationality Act, an arcane provision of law, to revoke the visas of students based on their political views.⁹ New Yorkers have had their green cards and visas revoked for exercising free speech and participation in protests.¹⁰

The Trump Administration has changed immigration enforcement policies to target anyone whom they believe may be subject to deportation, abandoning previous policies that required prioritization of people with criminal histories and that prohibited arrests at “sensitive locations.”¹¹ These policy changes have paved the way for ICE making arrests after routine immigration court appearances. ICE has begun more broad scale enforcement at immigration courts, working with the Department of Justice to dismiss removal proceedings before an immigration judge and then immediately arresting the individual and placing them into expedited removal proceedings.¹² Expedited removal allows ICE to fast-track deportation of certain noncitizens without seeing a judge.¹³ These arrests have been taking place at New York City immigration courts, causing fear and confusion and underscoring the urgent need for legal assistance.¹⁴

Most recently, the Trump Administration announced a sweeping new travel ban, banning travel entirely from twelve countries and partially for another seven countries.¹⁵ This xenophobic policy will separate families, block students and workers from entering the country, and further destabilize immigrant communities across New York City, which is home to some of the largest impacted diasporas in the country.

Impacts on Unaccompanied Children in New York City

In addition to the Trump Administration’s changes to federal immigration policy, the federal government has also abruptly terminated contracts with nonprofit providers across the country. Specifically, contracts that provided legal representation to unaccompanied children facing deportation have been terminated by the Trump Administration. In March 2025, the federal government abruptly terminated contracts providing legal services for unaccompanied children facing deportation.¹⁶ The contract covered legal representation for 26,000 children nationwide, including 1,800 children in New York.¹⁷ While multiple lawsuits have been filed to restore this funding, legal services providers face an unstable and uncertain future.¹⁸

Unlike criminal court, immigration court is considered civil, and as such there is no right to a government-appointed lawyer. This is true no matter the person’s age. Every year, thousands of children of all ages appear in New York City immigration courts without an attorney. With legal representation, these children have a 90% success rate in winning their cases.¹⁹ Without an attorney, they have only 15% chance of not being deported.²⁰ Without additional funding from local government, more and more children will appear in immigration court alone and risk deportation to dangerous conditions.

Adams Administration Immigration Policies

Cooperation with ICE

While the Trump Administration has ramped up immigration enforcement tactics, Mayor Adams has taken actions to increase the City government's cooperation with immigration authorities. The Adams Administration issued an Executive Order to allow ICE and other federal agencies to establish offices on Rikers Island.²¹ While this action has been temporarily blocked by a state court, it is indicative of a willingness to cooperate if not participate in Trump's "mass deportation" agenda.²² Similarly, the Adams Administration has held press conferences with the Trump Administration's "border czar" Thomas Homan to announce the arrest of alleged gang members.²³ These actions have escalated the risks of harm to New Yorkers. There are serious questions about data sharing between NYPD, Department of Correction and federal immigration agencies, particularly how information in the controversial gang databases may be shared.

Current City laws prohibit the use of City resources for "civil immigration enforcement."²⁴ However, given the Trump Administration's use of nontraditional methods, such as the Alien Enemies Act²⁵, there is growing concern among immigration advocates and legal service providers that the Adams Administration may expand its cooperation with federal authorities under the pretense that the cooperation is not related to "civil immigration enforcement." Taken together, the Adams Administration's recent actions and posture towards the Trump Administration threatens to funnel even more New Yorkers into immigration detention and deportation without due process of law.

Funding for Immigration Legal Services Programs

Despite the growing demand for immigration legal services, City Hall has not proposed additional funding for immigration legal services. In fact, the Adams Administration has defunded and ended several critical immigration legal services programs. It has decreased funding to the Rapid Response Legal Collaborative, which provides legal help to individuals at imminent risk of deportation. The City's signature immigration legal services program, ActionNYC, has been rebranded under the Adams Administration as the Mayor's Office of Immigrant Affairs (MOIA) Immigration Legal Help Centers.²⁶ The new model would effectively end ActionNYC in schools, libraries, and hospitals which by providing connections to legal services in those settings allowed the City to reach community members who may not otherwise be connected to community organizations.²⁷

The Adams Administration has also announced the end of the Asylum Application Help Center, which provided assistance to new arrivals in City shelters in applying for legal status and work authorization. The Help Center helped file 100,000 applications.²⁸ Despite knowing that State funding was likely to end, the Adams Administration did not create any contingency plan for funding loss, such as ways to re-purpose experienced staff or creating alternatives to maintain additional legal or application assistance to new arrivals. While the numbers of new arrivals are diminishing, the need for legal help has never been more urgent.

Finally, the Adams Administration has continually failed to budget responsibly for immigration legal services, ignoring both the increasing demand and the risk of federal funding cuts that threaten providers across the city. This urgent funding gap is made worse by the State's failure to allocate additional support for immigration legal services statewide. Without access to trusted immigration attorneys, many New Yorkers may end up victims of legal services fraud, which only compounds their vulnerability.²⁹

Recommendations

Dramatically Increase Funding Towards Existing Legal Services Programs

In 2024, New York City invested over \$60 million in legal services to support immigrant New Yorkers.³⁰ However, to meet the growing and urgent needs, the City must dramatically increase funding towards its immigration legal services programs. Access to legal representation protects New Yorkers, keeps families together, and mitigates against the economic harms of mass deportations. Each of the City's immigration legal services programs need additional funding to ensure that New Yorkers' due process rights are protected.

Invest an additional \$60 million in immigration legal services, including the expansion of ActionNYC to Schools, Hospitals, and Libraries

Increased funding to organizations that provide New Yorkers with access to legal representation to defend against deportation and keep families together is critical at this moment. The ActionNYC in schools, hospitals, and libraries program was critical to ensuring that New Yorkers in need of legal services can get connected to trusted providers by meeting them where they are at – in schools, hospitals, libraries. Community members who are not already connected to community-based organizations or who are not in the neighborhoods where the MOIA Immigration Legal Support Centers are located may miss connections to legal services if the City isn't making sure people are embedded in these institutions. This is particularly important for youth and children, elders, and people with disabilities. The Adams Administration should restore ActionNYC in schools, hospitals, and libraries.

Invest an additional \$40 million in the Immigration Opportunity Initiative (IOI)

The City should invest \$40 million in the Immigration Opportunity Initiative (IOI) to expand access to critical legal services for low-income immigrants. IOI provides representation for pathways to citizenship, permanent residence, and other forms of immigration relief that help stabilize families and strengthen communities. As federal enforcement ramps up and legal cases become more complex, demand for these services has grown significantly. Increased funding will ensure more New Yorkers can access trusted legal help to remain safely in their homes, jobs, and schools.

Invest an additional \$34 million to fully fund the New York Immigrant Family Unity Project (NYIFUP)

The City should allocate an additional \$34 million to fully fund the New York Immigrant Family Unity Project (NYIFUP), the nation's first and largest public defender program for detained immigrants. NYIFUP provides essential legal representation to New Yorkers facing deportation while in detention—often the difference between permanent separation from family and the ability to remain in their communities. As federal enforcement tactics expand and expedited removals increase, the need for high-quality defense in immigration court is more urgent than ever. Increased funding will allow NYIFUP to meet growing demand and ensure due process is not denied to immigrant New Yorkers.

Restore Funding to Critical Legal Service Programs

Fund Legal Representation for Unaccompanied Children

The Immigrant Children Advocates' Relief Effort (ICARE) provides critical legal representation to unaccompanied children in removal proceedings, many of whom are fleeing violence, trafficking, or abandonment, and have no parent or guardian to protect them. These children face a complex legal system alone, without a guaranteed right to a lawyer, despite life-altering consequences of deportation. Following the abrupt termination of federal contracts in early 2025, ICARE lost a major source of funding, putting thousands of children at immediate risk of facing immigration court unrepresented.

An additional investment of \$11 million in the City budget would provide sufficient funding for ICARE to continue their work and ensure that vulnerable children are not forced to navigate court proceedings alone. Without this investment, many could be deported to dangerous conditions simply because they lacked legal support.

Restore Funding to the Rapid Response Legal Collaborative

The Rapid Response Legal Collaborative (RRLC) provides legal assistance to those detained, or at imminent risk of detention and deportation, who may not have the right to see an immigration judge or are otherwise facing a fast-track to removal. As the Trump Administration deploys new tactics to fast track detentions and deportations, the work of the RRLC is becoming even more critical. Maintaining a separate program for rapid response allows providers to triage and respond accordingly to urgent cases, while allowing for other legal services programs not to become overwhelmed with emergencies. The Adams Administration discontinued most funding for the RRLC, but the City Council added the funding to maintain the program. However, given the increase in immigration enforcement, \$25 million should be allocated to a Rapid Response Fund to help sustain the RRLC and expand support to meet the growing need for urgent legal help.

Leverage City Agencies & Frontline Workers to Protect Immigrants from Federal Immigration Enforcement

Train City Workers and Contractors on the City's Non-cooperation Laws

As recommended by the Comptroller's Office to Mayor's Office of Immigrant Affairs Commissioner Castro in December 2024, the City should take immediate steps to ensure full compliance with its sanctuary laws by strengthening training, communication, and oversight across all agencies and contractors.³¹ All frontline City staff and contractors – including shelter operators, service providers, and School Safety Agents – should receive comprehensive, up-to-date training on the City's non-cooperation laws. This training must include real-world scenarios and be developed in consultation with immigration advocates to reflect community experiences and priorities.

The City should also post clear, multilingual signage in public-facing facilities like schools and shelters, informing individuals of their rights and explaining the limits of federal immigration authority. Finally, the City should issue guidance clarifying that “immigration enforcement” includes enforcement of the Alien Enemies Act and that “non-local law enforcement” includes U.S. military personnel engaged in immigration actions. Every City agency must adopt written policies affirming compliance with sanctuary laws and ensure their staff are properly trained to uphold them.

Increase Funding for Know Your Rights Trainings

The Adams Administration should expand and strengthen its efforts to better protect immigrant New Yorkers amid rising federal enforcement by providing additional funding to MOIA's Immigrant Rights Workshops. This expansion should include providing consistent, multilingual know your rights materials in all public-facing spaces, ensuring frontline staff are trained to direct individuals to legal resources, and funding community-based organizations to conduct proactive outreach. Know Your Rights information should be made available alongside the MOIA Immigration Legal Support Hotline to ensure New Yorkers can access the legal services they need. All frontline City staff should be trained to provide individuals with the MOIA hotline if they are in need of immigration legal services. MOIA should restore its videos on immigrant workers' rights and ensure that its Immigrant Rights Workshops include curriculum on immigrant workers' rights.

License Street Vendors

96% of street vendors in New York City are immigrants, many of whom are undocumented.³² Interactions with law enforcement can put vendors at risk for immigration consequences. Enforcement against street vendors has risen dramatically under the Adams Administration.³³ However, the Administration has not placed the same emphasis on issuing new street vending licenses as required by Local Law 18 of 2021 which would eliminate the need for enforcement in many cases. The Administration should allocate sufficient funding towards increasing staffing at the City agencies responsible for processing and issuing street vendor licenses and permits including the Department of Consumer and Worker Protection (DCWP) and the Department of

Health and Mental Hygiene (DOHMH). Additionally, the Administration should increase outreach and education for street vendors through Small Business Services (SBS) and track street vendor outreach.

Beyond fully implementing the current statutory requirements, major reforms to the City’s street vending system are necessary to regularize street vendors and prevent negative immigration consequences for vendors who come into contact with law enforcement. The City Council should additionally pass the [street vendor reform legislative package](#) (sponsored by Council Members Sanchez and Majority Leader Farias), which would eliminate the cap on licenses that has created a risky black market and make vending violations civil, not criminal, penalties.

Expand I-ARC’s Friend of the Court Program

The Immigrant Advocates Response Collaborative (I-ARC) organizes a “Friend of the Court” program, where trained volunteers assist pro se respondents in navigating the complex immigration court system and observe immigration court as a way of protecting against abuse of power when individuals appear unrepresented.³⁴ The City should partner with I-ARC to dramatically expand this program and coordinate connections to the City’s immigration legal services programs. For example, the San Francisco Bar Association operates an “Attorney of the Day” program where attorneys volunteer on a pro bono basis to provide counseling and same day representation to those in immigration court who cannot afford an attorney on their own.³⁵ This could be a model that the City should explore in NYC immigration courts to provide additional legal support to those navigating the court system without an attorney.

Strengthen the City’s Sanctuary Laws

As immigration enforcement has ramped up, including the use of arcane laws to circumvent due process protections, the City’s cooperation with immigration enforcement poses serious risks to the civil liberties of New Yorkers. City agencies have violated the sanctuary laws with virtually no consequences.³⁶ To better hold City agencies accountable to comply with non-cooperation laws, the City Council should pass the New York City Trust Act (Intro 214-2024) sponsored by Council Member Shahana Hanif.³⁷ The bill would establish a private right of action, allowing individuals to sue the City when agencies unlawfully detain them or collaborate with federal immigration enforcement in violation of sanctuary laws. Individuals would be able to seek injunctive relief as well as damages and fees.

To create a more meaningful deterrent and drive real accountability, the City should also require that any damages awarded under the Trust Act be paid directly from the budget of the agency responsible for the violation – rather than from the City’s general fund, as is currently the case. Today, because settlement payments come from the General Fund, agencies face no direct financial consequences for unlawful behavior, creating little incentive to change practice or reduce harm. As previously recommended by the Comptroller’s Office regarding claims settlements, placing the financial burden on the agency itself will create a stronger incentive to comply with the law and reduce harmful practices.

These reforms are especially urgent in light of recent actions by the Adams Administration, including efforts to allow federal immigration enforcement agencies office space on Rikers Island, which has been temporarily blocked by a state court. In addition to the Executive Order paused by a court, the Adams Administration has made clear its policy to cooperate with federal immigration enforcement authorities on “criminal investigations.” However, the unprecedented use of the Alien Enemies Act and other arcane provisions of law raise questions as to how the Adams Administration has interpreted the City’s sanctuary laws. The City Council should also consider legislation to clarify the scope and applicability of the City’s sanctuary laws, to make clear that enforcement of the Alien Enemies Act falls within the definition of “immigration enforcement” and that federal agencies outside of the Department of Homeland Security, U.S. military, and the National Guard are considered “federal immigration authorities” when they are engaged in immigration enforcement.

Pass the Access to Representation Act

The State can take actions that would immediately help protect New Yorkers. The state legislature should pass the Access to Representation Act (ARA), which would guarantee legal representation to New Yorkers facing deportation who cannot afford an attorney of their own.³⁸ This Office has previously reported on the economic benefits of the ARA and estimated that out of the backlog of 194,000 unrepresented New Yorkers in immigration court, an additional 53,000 New Yorkers would avoid deportation if they were given access to legal representation.³⁹ Additionally, the state can mitigate the risks to New Yorkers’ civil liberties by passing the New York for All Act, which would prohibit state agencies from cooperating with federal immigration agencies.⁴⁰

The Office of Court Administration (OCA) could also play an important role in supporting New Yorkers to gain legal immigration status. OCA should work within the family courts to train judges on Special Immigrant Juvenile Status (SIJS) and create a separate docket to more quickly process SIJS predicate orders. SIJS is a form of immigration relief available to young people under 21 who have experienced abuse, abandonment, or neglect by a parent.⁴¹ In order to apply for SIJS, the young person must first obtain an order from a family court judge finding they have experienced abuse, abandonment, or neglect by a parent.⁴² Training judges and creating a separate docket can ensure that the process is faster and more equitable for young New Yorkers seeking relief in state family courts.

Conclusion

As federal immigration enforcement expands and due process protections are eroded, the City and State have a responsibility to protect immigrant residents by investing in legal representation, strengthening sanctuary laws, and holding its own agencies accountable. The consequences of inaction are devastating. Deportation tears families apart, traumatizes children, destabilizes entire communities. The economic toll is significant, but the human cost is even greater. Immigrants are essential to New York's economy -- they are small business owners, caregivers, healthcare workers, and taxpayers. When immigrants are deported, families lose income, local businesses lose customers, and the City loses economic productivity and tax revenue. Pastor Martin Niemöller's words remind us of what's at stake: *"Then they came for me—and there was no one left to speak for me."* We cannot afford to stay silent or delay. City and State action can help ensure that immigrant New Yorkers are not left to face detention and deportation alone.

Acknowledgements

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Endnotes

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